

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION

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In Re:

Jason Wolfe & Meranda Wolfe

Social Security No.:

xxx-xx-2307 and xxx-xx-1229

Address:

1124 Charlie Long Rd., Hurdle Mills, NC 27541-

Case No. 10-80691- -

Chapter 13

Debtors

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**RESPONSE TO TRUSTEE'S  
MOTION TO ALLOW DISBURSEMENT OF FUNDS**

NOW come the above captioned Debtors, by and through the undersigned attorney and respectfully move the Court to deny the Motion filed by the Chapter 13 Trustee on March 8, 2011, to allow disbursement of funds for the reasons laid out in their **Motion to Allow Debtors to File Late Claim, for Attorney's Fees and for Violation of 12 U.S.C. § 2605(e)**.

Dated: March 14, 2011

Law Office of John T Orcutt

/s Edward C. Boltz

Edward C. Boltz

Attorney for Plaintiff

NC State Bar No.: 23003

1738 Hillandale Road

Durham NC 27705

[eboltz@johnorcutt.com](mailto:eboltz@johnorcutt.com)

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**CERTIFICATE OF SERVICE**

I, Edward C. Boltz , certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age and that on March 14, 2011 , I served copies of the foregoing **RESPONSE TO TRUSTEE'S MOTION TO ALLOW DISBURSEMENT OF FUNDS** electronically, or when unavailable, by regular first-class U.S. mail, addressed to the following parties:

Richard M. Hutson, II  
Chapter 13 Trustee

Bank of America  
Attn: Managing Agent  
400 National Way  
Mailstop CA6-919-02-22  
Simi Valley CA 93065

Michael West  
U.S. Bankruptcy Administrator

Jason & Meranda Wolfe  
1124 Charlie Long Rd.  
Hurdle Mills, NC 27541

BAC Home Loans  
Attn: Managing Agent  
Post Office Box 5170  
Simi Valley CA 93062-5170

and by certified mail, return receipt requested:

Bank of America  
Attn: Managing Agent  
400 National Way  
Mailstop CA6-919-02-22  
Simi Valley CA 93065

BAC Home Loans  
Attn: Managing Agent  
Post Office Box 5170  
Simi Valley CA 93062-5170

All creditors with duly filed claims as listed on the attached Report of Claims Filed at the addresses listed thereon.

/s Edward C. Boltz  
Edward C. Boltz